

The logo for Wells, featuring the word "wells" in a bold, blue, sans-serif font. The letter 'w' is stylized with a small white circle at its base.

**INDEPENDENT SERVICE PROVIDER OF CHOICE**

# Social Responsibility and legal compliance is at the core of Wells' values

## Comply with laws

We respect and support responsible labour practices as set out in the UN universal declaration of Human Rights and the UN Global Compact. We expect Business partners to comply with all laws and respect and support the protection of human rights of workers, as well as individuals and communities affected by their activities.

## Non-discrimination

Business partners must not engage in or support discrimination in hiring, employee advancement and employment practices, including on grounds of gender, age, religion, ethnicity, race, cultural background, disability, physical features, marital relationship status, sexual orientation, gender identity and expression, pregnancy or potential pregnancy, family responsibilities, political beliefs, industrial activity, union membership, irrelevant criminal record.

## Bullying, Harassment and Disciplinary Practices

Business partners must provide a workplace free from the use of violence, threats of violence or other forms of physical coercion or harassment. Corporal punishment, mental, physical or verbal abuse, sexual harassment or sexual abuse, and harsh or inhumane treatment must be prohibited by Business Partners.

## Freedom of Association

Business Partners must respect workers' freedom of association, recognise and protect their right to collective bargaining and to form join and administer workers' organisations. Business Partners will not discriminate, harass, intimidate or retaliate against workers for being members of a union or participating in trade union activities and provide worker representative with access to their workplace.

## Wages, benefits and conditions

Business Partners must comply with applicable laws relating to wages and benefits, including minimum wages, overtime pay and piece rates. Business partners must pay workers in a timely manner. Business partners must also comply with all laws related to working hours and legally mandated benefits. Workers will not be required to pay employers' or agents recruitment fees or other related fees for their employment. Deductions from wages as a disciplinary measure shall not be permitted.

## Child and Forced Labour

Child labour is strictly prohibited. Business Partners must comply with all applicable international standards and domestic regulations relating to the employment of children. Eliminate all forms of illegal, forced or compulsory labour and modern Slavery, defined as, the recruitment, movement, harbouring or receiving of children, women or men using force coercion abuse of vulnerability, deception or other means for the purpose of exploitation. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment.

## Health & Safety

Business Partners must deploy all necessary resources to ensure the health and safety of their employees in their workplace. Risks linked to their activities are identified, evaluated and either eliminated or mitigated through a health and safety management plan, established on the basis of international standards and comply with all local laws and work place exposure standards.

## Environmental

Business Partners will comply with all relevant local and international laws and regulations on environmental practices. Shall minimise impact on the environment of their activities and develop solutions that contribute to preserve, save water and energy. Shall implement environmental management plans in order to minimise or avoid all hazardous releases to air, soil and water and green house gas emissions.

# Ethics and Business Conduct

## Anti- Corruption

Business Partners will ban corruption, bribes, kickback and other means of obtaining an undue or improper advantage. Including, offering, authorising, giving or accepting cash, fees, commissions, credits, gifts, favours or anything of value that is either directly or indirectly provided in return for favourable treatment.

## Gifts & Invitations

- Wells' employees must not promise or offer gifts to our Business Partners (including their family or relatives) if the value exceeds \$100NZD, and no more than once per year to that same business partner, unless approved by the CEO in which case, the approved gifts and invitations must remain within the reasonable limits fixed by the applicable laws and customary commercial practices. Wells' employees will never promise, accept or give gifts in cash.
- Wells' employees (including their families or relatives) must not accept gifts nor invitations without the express approval of the CEO.

## Competition law

Relationships with Wells are built on honesty, trust and mutual interest through open and competitive bidding. Wells' Business Partners shall act in accordance with the principles of fair competition and apply standards of fair business.

## Conflict of Interest

A "conflict of interest" exists when an employee's private interests supersede or interfere with his/her professional interests, or when an employee or a close relative might benefit personally from a transaction involving a Business Partner of Wells. Business Partners will never take part in or seek to influence decision under circumstances that can create an actual or perceived conflict of interest . If Business partners or Wells' employees become aware of a potential or perceived conflict of interest affecting Wells, they will, without delay notify Wells.

## Privacy

Business Partners will protect, including ensure IS security of, personal data of everyone they do business with, including Suppliers, customers, consumers and employees. They will comply with privacy and information security laws and regulatory requirements when personal information is collected, stored and processed, transmitted and shared.

## References

United Nations Convention against Corruption  
The Commerce Act 1986  
Fair Trading Act 1986  
Contract and Commercial Law Act 2017  
Privacy Act 2020

I, the undersigned have read, understand and agree to Wells' Ethics & Business Code of Conduct

Company \_\_\_\_\_

Signature \_\_\_\_\_

Position \_\_\_\_\_

Date \_\_\_\_\_